



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

January 16, 2003

Mr. Bryan Foley  
United States Department of Energy  
P.O. Box 550, MSIN: A6-38  
Richland, Washington 99352

**RECEIVED**  
JAN 22 2003  
**EDMC**

Dear Mr. Foley:

Re: Waste Control Plans for the 200-PW-2 Operable Unit and the 200-PW-4 Operable Unit

The Washington State Department of Ecology (Ecology) has received and reviewed the Waste Control Plans for the 200-PW-2 Operable Unit (CP-13935) and the 200-PW-4 Operable Unit (CP-13934). The information was evaluated to determine if the proposed waste management was in compliance with the Environmental Restoration Program Strategy for Management of Investigation Derived Waste and the Washington Administrative Code Chapter 173-303 Dangerous Waste Regulations substantive requirements.

During review of the document the enclosed comments were compiled.

In support of these submittals, Ecology performed a site walk-down on January 8, 2003, for Operable Units 200-PW-2 and 200-PW-4. The following recommendations resulted from this walk-down:

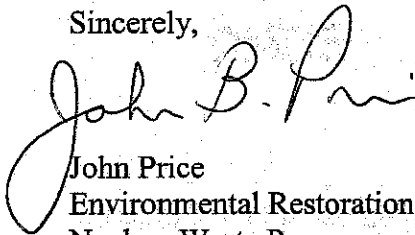
- All proposed waste storage sites should be constructed to provide Resource Conservation and Recovery Act (RCRA) compliant safe storage.
- All waste stored in the proposed waste storage areas must meet the requirements of RCRA safe storage.
- Most sites have uneven surfaces that need to be leveled. However, it is not recommended that grading of the existing waste site surface occur as this might affect the integrity of the existing surface stabilization material.
- Drive areas leading to the proposed waste storage areas should be stabilized to prevent digging into the existing cover material over the waste site.
- Construction material should be brought in to provide a flat, stable surface.
- All waste pending analysis should be marked "waste pending analysis".

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- The date of generation, dates samples were shipped to a testing laboratory, and testing facility information (name, address, and phone number) should be kept in a log book on site.

Ecology looks forward to working with your staff on the resolution of these comments. If you have any questions, please feel free to contact me at (509) 376-3029.

Sincerely,



John Price  
Environmental Restoration Project Manager  
Nuclear Waste Program

AH:sdb

cc: Larry Hulstrom, FH  
Rick Gay, CTUIR  
Pat Sobotta, NPT  
Russell Jim, YN  
Ken Niles, OOE  
Administrative Record

REVIEW COMMENT RECORD (RCR)	1. Date	2. Review No.
	3. Project No.	4. Page 1 of 1

5. Document Number(s)/Title(s)  Waste Control Plan for the 200-PW-2 Operable Unit CP-13935 and Waste Control Plan for the 200-PW-4 Operable Unit CP-13934	6. Program/Project/ Building Number	7. Reviewer  Brenda Becker-Khaleel	8. Organization/Group  Dept. of Ecology	9. Location/Phone  736-3003
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17. Comment Submittal Approval:                      10. Agreement with indicated comment disposition(s)                      11. CLOSED

Organization Manager (Optional)

Date

Reviewer/Point of Contact

Date

Reviewer/Point of Contact

Author/Originator

Author/Originator

12. Item	13. Comment(s)/Discrepancy(s) (Provide technical justification for the comment and detailed recommendation of the action required to correct/resolve the discrepancy/problem indicated.)	14. Hold Point	15. Disposition (Provide justification if NOT accepted.)	16. Status
General	The following comments apply to both documents (CP-13934 and CP-13935) unless the document number is called out at the beginning of the comment. If the document number is listed first, the comment only applies to the indicated document.			
General	The IDW strategy includes the following provision for waste from PW-2-OU and PW-4-OU. "If agreed to by the Project Manager from the Lead Regulatory Agency, this strategy may apply to certain wastes generated during investigation at inactive RCRA treatment, storage, and disposal (TSD) units at Hanford pursuant to the ERDF Explanation of Significant Difference and the associated letter of clarification." However, any materials generated during this investigation, which are sent to ERDF or			

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	an offsite disposal facility will have to meet the LDR treatment standards. Therefore, Ecology recommends seeking a contained in determination for the wastes generated during the PW-4 investigation.			
1	CP-13935, page ii. Under the heading <b>Drill Site Coordinate Location</b> , and Drive Casings at 216-A-10, several CXXXX numbers are provided, and a reference to Figure 1. Reference should be to Figure 3.			
2	CP-13935, page ii. Under the headings <b>Drill Site Coordinate Location</b> and <b>Sketch of Work Site</b> : The text indicates that the borehole/sample locations are shown on Figures 1, 2, and 3. The reader was not able to locate the sample locations. Please add them to the map or make them more obvious to the reader.			
3	CP-13934, page ii. Under the heading <b>Drill Site Coordinate Location</b> and <b>Sketch of Work Site</b> . The text indicates that the borehole/sample locations are shown on Figure 1. The reader was not able to locate the sample locations. Please add them to the map or make them more obvious to the reader.			
4	Page iv, Acronyms. The reader could not find the acronyms for MTCA or WAC spelled out in the text. The acronym RCT and WCP should be added to the list.			
5	Page 1, Description of Work, 3 <sup>rd</sup> paragraph. This paragraph references several other 'approved procedures' located in CP-A-EE-010, Part I, <i>Waste Management Plan</i> . Ecology has not reviewed, nor have we approved those procedures. Please add a statement that includes "in accordance with State and Federal regulations."			

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6	CP-13935, page 1, Description of Work, 4 <sup>th</sup> paragraph. The paragraph addressing waste minimization does not make sense. After reviewing the same paragraph in CP-13934, it appears some text was accidentally deleted. Please replace missing text.			
7	Page 2, Description of Work, last paragraph. The text discusses the purgewater collection criteria contained in letter 90-ERB-040, please delete this reference. The "Strategy for Handling and Disposing of Purgewater at the Hanford Site, Washington" is Attachment 5 of Revision 7 of the Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Hanford Site and is listed in Appendix F of the Hanford Federal Facility Agreement and Consent Order. Please use one of those references.			
8	Page 2, Waste Generation and Management, 2 <sup>nd</sup> paragraph. Please modify the text to read ....located at each of the four <b>drilling</b> sites...., to differentiate between the drilling sites and the spectral gamma logging sites.			
9	Page 2, Waste Generation and Management, 2 <sup>nd</sup> paragraph. It is not clear what the statement "if the preliminary hazard classification allows it" really means. Suggest clarifying or deleting text. Please clarify text that waste containers will be stored in a common area, but individual waste streams from separate sampling locations will not be commingled.			
10	CP-13935, page 3, Miscellaneous Solid Waste. Please provide clarification on how "process knowledge" will be used to designate waste for disposition.			

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11	CP-13934, page 3, Miscellaneous Solid Waste. MSW that has come into contact with suspect dangerous or suspect mixed waste with a listed code (F001-F005) must be managed as if it also had the listed code. Therefore, MSW which is generated at an investigation site which has a listed code on the Part A, Form 3, will require a contained-in determination prior to disposition at any location other than ERDF if it meets the waste acceptance criteria, or a permitted TSD. If a contained-in is not obtained the waste must be treated to meet LDR standards for the F001-F005 listed codes.			
12	CP-13934, page 3, Miscellaneous Solid Waste. This section needs to be rewritten. MSW which has come into contact with a listed waste must be disposed of as a listed waste, or a contained-in determination must be obtained. Listed waste can not be dispositioned using process knowledge unless it remains listed.			
13	CP-13935, page 3, Vadose Zone Drill Cuttings. Please provide clarification on how "process knowledge" will be used to designate waste for disposition.			
14	CP-13934, page 3, Vadose Zone Drill Cuttings. Drill cuttings that have come into contact with suspect dangerous, or suspect mixed waste with a listed code (F001-F005) must be managed as if they also have the listed code. Therefore, drill cuttings which are generated at an investigation site which has a listed code on the Part A, Form 3, will require a contained-in determination prior to disposition at any location other than ERDF if it meets the waste acceptance criteria, or a permitted TSD. If a contained-in is not obtained the waste must be treated to meet LDR standards for the			

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	F001-F005 listed codes.			
15	CP-13934, page 3, Vadose Zone Drill Cuttings. This section needs to be rewritten. Drill cuttings which have come into contact with a listed waste must be disposed of as a listed waste, or a contained-in determination must be obtained. Listed waste can not be dispositioned using process knowledge unless it remains listed.			
16	Page 3, Decontamination Fluids. Please revise reference to Purgewater Strategy per comment #7.			
17	Page 4, Decontamination Fluids. Please delete the following text "...or other location as authorized by the regulatory agency."			
18	CP-13934, page 4, Equipment and Construction Materials. Material generated during the investigation should be maintained near the point of generation pending a contained-in determination for final disposition. Decontamination fluids should be taken to the 600 Area Purgewater Storage and Treatment Facility. If decontamination activities take place at the contractor's decontamination facility, the MSW generated from decontamination should be taken to a RCRA 90-day pad upon completion of decontamination activities for each borehole. The material at the 90-day pad should be labeled as "waste pending analysis" and is subject to the contained-in determination. Please revise text appropriately.			
19	Page 4, Nondangerous/No-Radiation-Added Solid Waste. Please insert the following text into the last sentence "...waste can be containerized, <u>segregated</u> , and stored at the designated site-specific waste container storage area."			

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20	Page 4, Unplanned Release. <i>The Environmental Restoration Program Strategy for Management of Investigation Derived Waste</i> states that "reporting of any release of IDW shall be done in accordance with applicable provisions of WAC 173-303-145 and 40 CFR 302." Please modify text to indicate notification of the ONC will comply with these regulatory requirements.			
21	Page 5, Management of Waste Containers. Please indicate that containers awaiting analytical results will be labeled as "Waste Pending Analysis" in accordance with TIM 82-5(Revised 10/93).			
22	Page 5, Final Disposal/Storage, 1 <sup>st</sup> paragraph. The COPCs were established for each Operable Unit through the DQO process, and should be documented in the RI/FS Work Plan. It is not clear what is meant by the statement "process knowledge may be used to include/exclude a radiological or chemical contaminant from the project ..." Please delete, or consult with Ecology to develop mutually acceptable text.			
23	Page 5, Final Disposal/Storage, 2 <sup>nd</sup> paragraph. Please insert the following text "Nonradiologically contaminated dangerous waste may be shipped onsite to ERDF or to an offsite <b>RCRA</b> facility, contingent upon the waste meeting the offsite <b>RCRA</b> disposal facility's waste."			
24	Page 5, Final Disposal/Storage, 2 <sup>nd</sup> paragraph, last sentence. Please insert the following text "Waste above <b>radiological</b> release levels that meets the ERDF....."			
25	Page 5, Final Disposal/Storage, 3 <sup>rd</sup> paragraph. Please provide additional explanation regarding the "airborne radioactive area" posting. This posting, in an outdoor situation, raises questions about the safety of human			